

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

ATLANTIC CASUALTY)
INSURANCE COMPANY, Inc.,)
)
Plaintiff,)
)
v.)
)
KESHAV KALINDI, LLC, d/b/a)
WESTWOODS MOTEL,)
)
and,)
)
BHARAT SAHEBA,)
)
and,)
)
DOUGLAS BOWEN,)
)
Defendants.)

Case No.: 4:13-cv-01252-HEA

**DEFENDANT DOUGLAS BOWEN'S MOTION TO
STAY FIRST AMENDED COMPLAINT**

COMES NOW Defendant Douglas Bowen, by and through his attorneys, Lake Law Firm, L.L.C., and respectfully moves this Court to stay this proceeding during the pendency of parallel state proceedings involving the same parties, the same insurance policy, and the same coverage question under state law as this case.

Defendant Bowen hereby incorporates by this reference his Memorandum of Law in support of this motion, filed concurrently herewith, as if fully set forth herein.

LAKE LAW FIRM, LLC

/s/ Tom Pirmantgen

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CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2014, a copy of the foregoing Motion to Stay was filed electronically with the Court, with notice of the filing generated and sent electronically by the Court's CM/ECF system to Francis X. Duda and Mariano Favazza, Anderson & Gilbert, L.C., 515 Olive Street, Suite 704, St. Louis, Missouri 63101-1833 and Todd Muchnick, Muchnick & Haber, 8151 Clayton Road, Ste. 201, St. Louis, Missouri 63117.

s/ Tom Pirmantgen

Attorney for Plaintiff